

April 19, 2004

From: Rene Desany, K1MVP    Ref. RM-10867 ARRL Proposal  
25 Pinehurst Drive  
Jericho, Vt., 05465

To:    Federal Communications Commission  
445 12th Street SW  
Washington, DC 205

To whom it may concern,

I was first licensed in as an amateur-operator in 1959, have had a General Radiotelephone License since 1981, and FAA Avionics Repairman Certificate with 40 yrs+ in both civilian and military avionics. I have read over the ARRL proposal, RM-10867. I feel this proposal by the League as it now stands with further reduction of the Morse code requirement and with an "automatic upgrade" for the technician class licensee to "general" without further testing, is just an effort by the ARRL to increase the numbers and would not protect the integrity nor the future of amateur radio in the long run.

Until recently, the ARRL had an excellent record of representing the amateur radio community in looking out for its best interests, but sadly such is not now the case in light of this recent proposal.

The ARRL's claim, is they want to bring amateur radio into the 21st century, by streamlining and restructuring amateur radio, and making room for the new digital modes.

I have also read comments from those who favor this proposal who claim that Morse code is dead, irrelevant, and a deterrent to attracting new people to amateur radio. These same people also cite that most other countries have deleted the CW requirement. This is simply not true, as only about 10 percent have deleted CW, i.e. Great Britain, and they have "offsetted" the deletion by "restructuring" or "beefing up" the written exams to reflect a more comprehensive exam system.

My contention, is that if cw is eliminated or sharply reduced a great "hands on" learning incentive will be lost for the beginner. Therefore, it is IMPERATIVE that the written exams be restructured, by scrapping the published question pools, to eliminate memorization of answers, and that a more comprehensive method be instituted to test an applicants true understanding of electronics and RF principles, etc.

As a trainer-mentor in the military, in avionics, I found it was imperative that a trainee had a good solid grasp of electronics fundamentals, to be able to grow and upgrade into a capable and knowledgeable technician. The same principles should hold true for an amateur radio operator. To upgrade AND be knowledgeable, it is imperative that he have a solid grasp of the "fundamentals of electronics."

The exam system now in place, with published question pools and "jiffy" ham classes do not test an applicants true understanding of the basics, and serve no good purpose but to increase the numbers and NOT the quality or integrity of amateur radio. This system would be intolerable in industry or the military. Why should amateur radio be any different?

In summary, a "minimal" CW requirement of 5 wpm should be retained for both the General and Extra class (5 wpm is hardly a hardship), if for no other reason than to preserve ham radio's "tradition." If not, than it would be IMPERATIVE to upgrade the present exam structure to reflect a more comprehensive written test to test an applicants true understanding of electronics.

The present written exam system left as is, it will erode amateur radio into a "ham CB" service, and lead to its demise. This should not be allowed.

I trust the commission will act in the best interest for the long term future of the amateur radio service. RM-10867 DOES NOT reflect the best interests of ham radio as it now stands.

Thank you for your time and attention in this matter.

Sincerely,

Rene Desany, K1MVP